

THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AMOS KEYES,	)	
	)	
Plaintiff	)	
	)	
vs.	)	C.A. 05-104
	)	
OFFICER DANIEL RUSSO, OFFICER	)	
PETER MITCHELL and OFFICER	)	
STEVEN DELUCA,	)	
	)	
Defendants	)	

**PLAINTIFF'S REPORT OF RULE 26(f) DISCOVERY PLAN**

Pursuant to F.R.C.P. 26(f), the plaintiff, through his undersigned counsel, respectfully submits the following report:

1. Paul Susko, counsel for plaintiff Amos Keyes, and Edmond R. Joyal, Jr., counsel for the three (3) defendants have conferred by telephone regarding the subjects enumerated in Rule 26(f).
2. Plaintiff has agreed to provide initial disclosures under F.R.C.P. 26(a)(1) at this time.
3. The Plaintiff proposes the following pre-trial schedule:
  - (a) the parties shall complete discovery on or before October 30, 2005;
  - (b) plaintiff's Pre-Trial Narrative Statement shall be filed on or before November 30, 2005;
  - (c) defendants' Pre-Trial Narrative Statements shall be filed on or before December 30, 2005;

- (d) on or before December 30, 2005, any party may file a dispositive motion which shall be accompanied by a supporting brief and such affidavits and other supporting documentation as may be appropriate. Any responding party may file an opposing brief, together with such affidavits and opposing documents as may be appropriate on or before January 30, 2006.

4. At the time of the submission of this Plan, the plaintiff anticipates no change in the limitations on discovery imposed by the Federal Rules of Civil Procedure.

Respectfully submitted,

KUBINSKI, SUSKO & SCHONTHALER

By: Paul J. Susko

Paul J. Susko  
135 East Sixth Street  
Erie, PA 16501  
(814) 455-7612  
Attorneys for Plaintiff, Amos Keyes

Date: July 1, 2005

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STEVEN DELUCA,	)	
	)	
Defendants	)	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 1<sup>st</sup> day of July, 2005, a copy of the within document was served on all counsel of record and unrepresented parties in accordance with the applicable rules of court.

Respectfully submitted,

KUBINSKI, SUSKO & SCHONTHALER

By: Paul J. Susko  
Paul J. Susko